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September 22, 2000

EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: Tariff Filings by all Telephone Companies Regarding Reclassification of
Pay Telephone Service as Required by FCC Order 96-439
Docket No. 97-00409

Dear Mr. Waddell:

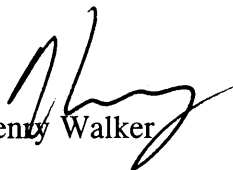
Please accept for filing the original and thirteen copies of the Supplemental
Discovery Requests to BellSouth Telecommunications, Inc. filed on behalf of the Tennessee
Payphone Owners Association in the above-captioned proceeding. Copies have been provided to
parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker



HW/nl
Enclosure

POSTED
4-25-00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: TARIFF FILINGS BY LOCAL EXCHANGE COMPANIES TO COMPLY
WITH FCC ORDER 96-439 CONCERNING THE RECLASSIFICATION OF
PAY TELEPHONES**

DOCKET NO. 97-00409

REC'D TN
REGULATORY AL
SEP 22 PM
OFFICE OF THE
EXECUTIVE SECRETARY

**TENNESSEE PAYPHONE OWNERS ASSOCIATION'S
SUPPLEMENTAL DISCOVERY REQUESTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.,**

The Tennessee Payphone Owners Association ("TPOA") submits the following supplemental interrogatories to BellSouth Telecommunications, Inc. ("BST") concerning the testimony and cost studies filed by BellSouth on September 15, 2000.

1. Refer to page A.1.10 (bates stamp 000028) of Exhibit DDC-1.
 - a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.
 - b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.
 - c. Provide a copy of worksheet A.1.10 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the

worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

2. Refer to page C.1.1 (bates stamp 000032) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet C.1.1 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model.

To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

3. Refer to page C.1.2 (bates stamp 000038) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet C.1.2 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

4. Refer to page C.2.1 (bates stamp 000044) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet C.2.1 as it would have appeared if BellSouth had not

undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

5. Refer to page C.2.2 (bates stamp 000050) of Exhibit DDC-1.

- a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.
- b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.
- c. Provide a copy of worksheet C.2.2 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the

worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

6. Refer to page D.1.1 (bates stamp 000056) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet D.1.1 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

7. Refer to page D.1.2 (bates stamp 000063) of Exhibit DDC-1.
- a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.
 - b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.
 - c. Provide a copy of worksheet D.1.2 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

8. Refer to page S.1.1 (bates stamp 000067) of Exhibit DDC-1.
- a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.
 - b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet S.1.1 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

9. Refer to page S.1.2 (bates stamp 000071) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet S.1.2 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition

previously approved by the Authority.

RESPONSE:

10. Refer to page S.1.3 (bates stamp 000076) of Exhibit DDC-1.

a. Describe in detail the steps taken by BellSouth to cause the entries in the column entitled "Shared Cost" be \$0.00.

b. Describe in detail the steps taken by BellSouth to cause the "Common Cost Factor" to be 1.0000.

c. Provide a copy of worksheet S.1.3 as it would have appeared if BellSouth had not undertaken the steps described in parts a. and b. above, but instead had permitted the worksheet to produce and report a "Monthly Economic Cost" that includes the level of shared and common costs that would otherwise have been produced by the model. To be clear, TPTA is asking BellSouth to hold all other worksheet inputs constant as presented in Exhibit DDC-1, and to specifically restore the portions of the worksheet that calculate "Shared Cost" and "Common Cost" to the condition previously approved by the Authority.

RESPONSE:

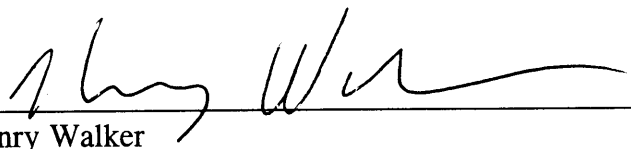
11. Define "reasonable overhead."

RESPONSE:

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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*Attorney for Tennessee Payphone Owners
Association*

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 1997 a copy of the foregoing document was served on the parties of record, via hand delivery, addressed as follows:

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